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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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Display Works, LLC, CASE NO. 16 CV 00583 (MCA)

Plaintiff,

v.

Michael Bartley, an individual, and Derse, Inc.

Defendants.
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ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS

THIS MATTER being opened to the Court by Mitchell Silberberg & Knupp LLP, attorneys for Plaintiff Display Works LLC (“Display Works”) upon notice to the defendants Michael Bartley (“Bartley”) and Derse, Inc. (“Derse”) (collectively referred to as “defendants”), and the Court having considered the Verified Complaint, the supporting Declaration of Nicholas Lacamera, the Brief submitted herewith and the arguments of counsel, and the Court having reviewed all of the papers, if any, submitted by the parties; and the Court having afforded the parties the opportunity to be heard; and for good cause shown;

IT IS ON THIS 10th day of February, 2016

ORDERED that, pending the issuance of a decision on the application of Display Works for a preliminary injunction, defendant Bartley is hereby enjoined and restrained from directly or indirectly:

- (a) Hiring, soliciting, contacting, or engaging in business with any client or customer of Display Works who has not yet been retained by Derse;
- (b) Interfering or seeking to interfere with any relationship between Display Works and any of its clients, customers, or employees;
- (c) Soliciting or hiring any employee of Display Works to work for Bartley or Derse;
- (d) Communicating or divulging to, or using for the benefit of defendants, or any other person, firm, association, or corporation, other than Display Works, any Confidential Information of Display Works, as such term is defined in the Non-Competition, Non-Solicitation and Non-Disclosure Agreement between Display Works and Defendant Bartley dated January 16, 2008 (the “Non-Competition Agreement”), or proprietary information of Display Works (including, but not limited to trade secrets) which defendant Bartley discovered, developed, or became knowledgeable about while working for Display Works;

IT IS FURTHER ORDERED that, pending the issuance of a decision on the application of Display Works for a preliminary injunction, defendant Derse is hereby enjoined and restrained from encouraging, facilitating or participating in conduct of defendant Bartley from which he is hereby enjoined and restrained;

IT IS FURTHER ORDERED that defendants shall show cause before this Court at the United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on the **24th** day of **February** 2016, at **11:00 AM**, why an Order should not be entered that preliminarily enjoins the Defendants from engaging in the above mentioned conduct;

IT IS FURTHER ORDERED that defendants shall file and serve any opposition papers to the within Order to Show Cause by **February 17th, 2016**; and

IT IS FURTHER ORDERED that plaintiff Display Works shall file and serve any reply to the papers to defendants' opposition by **February 22, 2016**;

IT IS FURTHER ORDERED that a copy of this Order to Show Cause be served upon defendants within 1 day of the date hereof via overnight courier service.



MADELINE COX ARLEO, U.S.D.J.